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WMN:SLT

F.# 2010R01661/OCDETF # NY-NYE-648Z / NY-NYE-670Z

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

S U P E R S E D I N G
I N D I C T M E N T

- against -

GJAVIT THAQI,
also known as "Doc,"
ARIF KURTI,
also known as "The Bear,"
"Arty" and "Nino,"

Cr. No. 11-486 (S-1) (DLI)
(T. 21, U.S.C., §§
841(b)(1)(A)(ii)(II),
841(b)(1)(A)(vii),
841(b)(1)(C), 846, 848(a),
848(c), 853(a), 853(p),
959(c), 960(b)(1)(B)(ii),
960(b)(1)(G) and 963;
T. 18, U.S.C., §§
924(c)(1)(A)(i),
924(c)(1)(A)(ii),
924(c)(1)(A)(iii), 924(d),
982(a)(1), 982(b), 1956(h),
3238, 2 and 3551 et seq.;
T. 28, U.S.C., § 2461(c))

GJEVALIN BERISHA,
also known as "Jev,"

CARLOS ALVAREZ,
also known as "The Kid,"
SHKELQIM BAKRAQI,
also known as "Juicehead"
and "Avnia,"

ROBERT BONURA,

ALEJANDRO CALDERIN,
JOHN CEKAJ,
MARTINO CEKAJ,
also known as "Marty,"
GIOVANNI DIFFUCIA,

BRIAN DUBLYNN,
also known as "Big Brian"
and "Brian Dubbs,"

ARVY EBRAHIME,
also known as "Arty,"
HECTOR FLORES,

ANGELO GERMANO,
also known as "Fat Ange,"

JETON GJIDIJA,
also known as "Tony G,"

PERRY IEROPOLLI,
also known as "Junior,"
AL KARAQI,
LEE KARAQI,
ROBERT KARAQI,
HASAN KURTI,
also known as "Ozzie,"
IBRAHIM KURTI,
also known as "Big Brian,"

BAJRAM LAJQI,
also known as "Brian Lajqi"
and "Van Damme,"
SELMAN LAJQI,
also known as "Simon,"

ALESSANDRO LATINO,
LAURETTA LOKAJ,
NIKOLA LUKAJ,
also known as "Nick,"

NICHOLAS MASI,
DAVID MCLEAN,
FATMIR MEHMETI,
also known as "Lucky,"
FAIK MEHMETI,
also known as "Frank Nitti,"
NEFAIL MEHOVIC,
also known as "Nef" and
"Little Guy,"
VALTER MEMIA,
also known as
"Pavlo Codenotti,"

ALBERTO MERCADO,
also known as "Fat Boy,"

MAGDALENA NIKOLLAJ,
also known as
"Magdalena Karaqi,"
MAL REXHA,
DARIUS RIVERA,
ROBERT RUDAJ,
also known as "Doka Rudaj,"

LANCE SCHONER,
LESTER ZABORSKI and
AGRON ZENELAJ,
also known as "Paddy" and
"Jimmy,"

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE
(Continuing Criminal Enterprise)

1. In or about and between January 1999 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

and GJEVALIN BERISHA, also known as "Jev," did knowingly and intentionally engage in a continuing criminal enterprise, in that they committed violations of Title 21, United States Code, Sections 841, 846, 952(a), 953(a), 959(a), 960 and 963, including

Counts Two through Eight set forth below, which violations were part of a continuing series of violations of those statutes undertaken by the defendants GJAVIT THAQI, ARIF KURTI,

and GJEVALIN BERISHA, in concert with five or more other persons, with respect to whom the defendants GJAVIT THAQI, ARIF KURTI, and GJEVALIN BERISHA occupied positions of organizer, supervisor and manager, and from which continuing series of violations the defendants GJAVIT THAQI, ARIF KURTI,

and GJEVALIN BERISHA obtained substantial income and resources.

(Title 21, United States Code, Sections 848(a) and 848(c); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Conspiracy to Import Marijuana)

2. In or about and between January 2001 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev,"

CARLOS ALVAREZ, also known as "The Kid," SHKELQIM BAKRAQI, also known as "Juicehead" and "Avnia," JOSEPH BEVILACQUE, also known as "Joey Bev,"

ALEJANDRO CALDERIN, JOHN CEKAJ, MARTINO CEKAJ, also known as "Marty," GIOVANNI DIFUCCIA, BRIAN DUBLINN, also known as "Big Brian" and "Brian Dubbs," ARVY EBRAHIME, also known as "Arty," HECTOR FLORES, ANGELO GERMANO, also known as "Fat Ange,"

JETON GJIDIJA, also known as "Tony G,"

PERRY IEROPOLLI, also known as "Junior," AL KARAQI, LEE KARAQI, ROBERT KARAQI, HASAN KURTI, also known as "Ozzie," IBRAHIM KURTI, also known as "Big Brian," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick,"

NICHOLAS MASI, DAVID MCLEAN, FATMIR MEHMETI, also known as "Lucky," FAIK MEHMETI, also known as "Frank Nitti," NEFAIL MEHOVIC, also known as "Nef" and "Little Guy," VALTER MEMIA, also known as "Pavlo Codenotti," ALBERTO MERCADO, also known as "Fat Boy," MAL REXHA,

DARIUS RIVERA, ROBERT RUDAJ, also known as "Doka Rudaj,"

LESTER ZABORSKI and AGRON ZENELAJ, also known as "Paddy" and "Jimmy," together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved 1,000 kilograms or more of a substance containing

marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(1)(G); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE

(Conspiracy to Distribute Marijuana)

3. In or about and between January 2001 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev,"

CARLOS ALVAREZ, also known as "The Kid,"
SHKELQIM BAKRAQI, also known as "Juicehead" and "Avnia,"

ALEJANDRO CALDERIN, JOHN CEKAJ, MARTINO CEKAJ, also known as "Marty," GIOVANNI DIFUCCIA, BRIAN DUBLINN, also known as "Big Brian" and "Brian Dubbs," ARVY EBRAHIME, also known as "Arty," HECTOR FLORES, ANGELO GERMANO, also known as "Fat Ange,"

JETON GJIDIJA, also known as "Tony G,"

PERRY IEROPOLLI, also known as

"Junior," AL KARAQI, LEE KARAQI, ROBERT KARAQI, HASAN KURTI, also known as "Ozzie," IBRAHIM KURTI, also known as "Big Brian," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick,"

NICHOLAS MASI, DAVID MCLEAN, FATMIR MEHMETI, also known as "Lucky," FAIK MEHMETI, also known as "Frank Nitti," NEFAIL MEHOVIC, also known as "Nef" and "Little Guy," VALTER MEMIA, also known as "Pavlo Codenotti," ALBERTO MERCADO, also known as "Fat Boy," MAL REXHA, DARIUS RIVERA, ROBERT RUDAJ, also known as "Doka Rudaj,"

LESTER ZABORSKI and AGRON ZENELAJ, also known as "Paddy" and "Jimmy," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 1,000 kilograms or more of a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(vii); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR

(International Marijuana Distribution Conspiracy)

4. In or about and between January 2001 and June 2011, both dates being approximate and inclusive, within the

extraterritorial jurisdiction of the United States, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev,"

NICHOLAS MASI, VALTER MEMIA, also known as "Pavlo Codenotti," ALBERTO MERCADO, also known as "Fat Boy," and

also known as "Pashka Lunaj," together with others, did knowingly and intentionally conspire to distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved 1,000 kilograms or more of a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 959(a) and 960(a)(3).

(Title 21, United States Code, Sections 963, 959(c) and 960(b)(1)(G); Title 18, United States Code, Sections 3238 and 3551 et seq.)

COUNT FIVE

(Conspiracy to Distribute Cocaine)

5. In or about and between December 1999 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear,"

"Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev," SHKELQIM BAKRAQI, also known as "Juicehead" and "Avnia,"

JOHN

CEKAJ, MARTINO CEKAJ, also known as "Marty," BRIAN DUBLYNN, also known as "Big Brian" and "Brian Dubbs," ANTHONY GATT, also known as "Gakk," ANGELO GERMANO, also known as "Fat Ange,"

JETON GJIDIJA, also known as "Tony G," ROBERT KARAQI, HASAN KURTI, also known as "Ozzie," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick," NICHOLAS MASI, FATMIR MEHMETI, also known as "Lucky," FAIK MEHMETI, also known as "Frank Nitti," VALTER MEMIA, also known as "Pavlo Codenotti,"

and ROBERT RUDAJ, also known as "Doka Rudaj," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance

containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT SIX
(Conspiracy to Export Cocaine)

6. In or about and between December 1999 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev," SHKELQIM BAKRAQI, also known as "Juicehead" and "Avnia,"

JOHN
CEKAJ, MARTINO CEKAJ, also known as "Marty," BRIAN DUBLYNN, also known as "Big Brian" and "Brian Dubbs,"

ANGELO GERMANO, also known as "Fat Ange,"

JETON GJIDIJA, also known as "Tony G," ROBERT KARAQI, HASAN KURTI, also known as "Ozzie," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick," NICHOLAS MASI, FATMIR MEHMETI, also known as "Lucky," FAIK

MEHMETI, also known as "Frank Nitti," VALTER MEMIA, also known as "Pavlo Codenotti,"

and ROBERT RUDAJ, also known as "Doka Rudaj," together with others, did knowingly and intentionally conspire to export a controlled substance from the United States to one or more countries outside thereof, to wit: Canada, Spain and Albania, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 953(a) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

COUNT SEVEN

(Conspiracy to Import Cocaine)

7. In or about and between January 2010 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev," SHKELQIM BAKRAQI, also known as "Juicehead" and "Avnia,"

JOHN

CEKAJ, MARTINO CEKAJ, also known as "Marty," BRIAN DUBLYNN, also

known as "Big Brian" and "Brian Dubbs," ANTHONY GATT, also known as "Gakk," ANGELO GERMANO, also known as "Fat Ange,"

JETON GJIDIJA, also known as "Tony G," ROBERT KARAQI, HASAN KURTI, also known as "Ozzie," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick," NICHOLAS MASI, FATMIR MEHMETI, also known as "Lucky," FAIK MEHMETI, also known as "Frank Nitti," VALTER MEMIA, also known as "Pavlo Codenotti,"

and ROBERT RUDAJ, also known as "Doka Rudaj," together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

COUNT EIGHT

(Conspiracy to Distribute Oxycodone)

8. In or about and between August 2010 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc,"

GIOVANNI DIFUCCIA, ANGELO GERMANO, also known as "Fat Ange," HASAN KURTI, also known as "Ozzie," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," LAURETTA LOKAJ, NICHOLAS MASI, VALTER MEMIA, also known as "Pavlo Codenotti," and AGRON ZENELAJ, also known as "Paddy" and "Jimmy," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT NINE
(Money Laundering Conspiracy)

9. In or about and between January 2001 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev," SHKELQIM BAKRAQI,

also known as "Juicehead" and "Avnia,"

ROBERT BONURA,

GIOVANNI DIFUCCIA, BRIAN DUBLINN, also known as "Big Brian" and "Brian Dubbs," HECTOR FLORES,

JETON

GJIDIJA, also known as "Tony G," AL KARAQI, LEE KARAQI, ROBERT KARAQI, HASAN KURTI, also known as "Ozzie,"

BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon,"

ALESSANDRO LATINO, LAURETTA LOKAJ, NICHOLAS MASI, VALTER MEMIA, also known as "Pavlo Codenotti," ALBERTO MERCADO, also known as "Fat Boy,"

MAGDALENA NIKOLLAJ, also known as "Magdalena Karaqi," MAL REXHA, LANCE SCHONER and AGRON ZENELAJ, also known as "Paddy" and "Jimmy," together with others, did knowingly and intentionally conspire to: (i) conduct one or more financial transactions in and affecting interstate and foreign commerce, to wit: the transfer and delivery of United States currency, which transactions in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 952(a), 953(a), 959, 960(a)(1) and 963, knowing that the property involved in the transactions represented the proceeds of

some form of unlawful activity, (a) with the intent to promote the carrying on of specified unlawful activity, to wit: narcotics trafficking, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and (ii) transport, transmit and transfer monetary instruments and funds from a place in the United States to and through a place outside the United States, to wit: Canada, (a) with the intent to promote the carrying on of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 18, United States Code, Section 1956(a)(2)(A), and (b) knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and that such transportation, transmission and transfer were designed in whole and in part to avoid one or more transaction reporting requirements under Federal law, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(ii).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT TEN

(Use of Firearms During and in Relation to Drug Trafficking)

10. In or about and between January 2001 and June 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GJAVIT THAQI, also known as "Doc," ARIF KURTI, also known as "The Bear," "Arty" and "Nino,"

GJEVALIN BERISHA, also known as "Jev,"

CARLOS ALVAREZ, also known as "The Kid,"

MARTINO CEKAJ, also known as "Marty," BRIAN DUBLYNN, also known as "Big Brian" and "Brian Dubbs," HASAN KURTI, also known as "Ozzie," BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," SELMAN LAJQI, also known as "Simon," NIKOLA LUKAJ, also known as "Nick," FAIK MEHMETI, also known as "Frank Nitti," ALBERTO MERCADO, also known as "Fat Boy," ROBERT RUDAJ, also known as "Doka Rudaj," and AGRON ZENELAJ, also known as "Paddy" and "Jimmy," did knowingly and intentionally use and carry one or more firearms during and in relation to one or more drug trafficking crimes, to wit: the crimes charged in Counts One through Eight, and did knowingly and

intentionally possess said firearms in furtherance of such drug trafficking crimes.

(Title 18, United States Code, Sections
924(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT ELEVEN

(Use of Firearms During and in Relation to Drug Trafficking)

11. On or about June 4, 2011, within the Eastern District of New York and elsewhere, the defendants BAJRAM LAJQI, also known as "Brian Lajqi" and "Van Damme," and CARLOS ALVAREZ did knowingly and intentionally use and carry one or more firearms during and in relation to one or more drug trafficking crimes, to wit: the crimes charged in Counts One through Eight, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crimes, which firearms were brandished and discharged.

(Title 18, United States Code, Sections
924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNTS ONE THROUGH EIGHT
(Continuing Criminal Enterprise, Narcotics Importation,
Exportation and Distribution Conspiracies)

12. The United States hereby gives notice to the defendants charged in Counts One through Eight that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offenses, to forfeit (a) any property constituting, or derived

from, any proceeds obtained, directly or indirectly, as a result of such offenses; (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses; and (c), with respect to Count One, any interest in, claims against, and property or contractual rights affording a source of control over, the continuing criminal enterprise, including, but not limited to, the following for Counts One through Eight:

Money Judgment

(a) a sum of money equal to at least approximately \$500,000,000.00, the total amount of gross proceeds the defendants obtained as a result of the offenses, for which the defendants are jointly and severally liable.

Specific Property

(b) all right, title and interest in the real property located at 1957 Bronxdale Avenue, Apt. B34, Bronx, NY;

(c) all right, title and interest in the real property located at 1523 Waterson Drive, Bronx, NY;

(d) all right, title and interest in the real property located at 300 Mamaroneck Avenue Apt. 325, White Plains, NY;

(e) all right, title and interest in the real property located at 2797 Mandalay Beach Road, Wantagh, NY;

(f) all right, title and interest in the real

property located at 64 Crotty Avenue, Yonkers, NY;

(g) all right, title and interest in the real property located at 24 Seagull Lane Lincroft, NJ 07738;

(h) all right, title and interest in a 2010 Grey Volkswagen Jetta with New York Registration Number EVB3720;

(i) all right, title and interest in a 2006 Blue Buick Rendezvous with New York Registration Number DRP3365;

(j) all right, title and interest in a 2007 Grey Cadillac with New York Registration Number EXB9982;

(k) all right, title and interest in a 2007 Grey Audi A8 with New York Registration Number FCW9455;

(l) all right, title and interest in a Grey Nissan 350Z with Florida Registration Number PEA2Q;

(m) all right, title and interest in a 2008 Black Cadillac Escalade with New York Registration Number FHR1121;

(n) all right, title and interest in a 2007 Grey Jeep Grand Cherokee Cadillac with New York Registration Number ECT6888;

(o) all right, title and interest in a 2009 Acura TSX with New York Registration Number EJT3935;

(p) all right, title and interest in a Grey Volkswagen Golf with New York Registration Number ERK4718;

(q) all right, title and interest in a 2008 Green Volkswagen Passat with New York Registration Number DFN2049;

(r) all right, title and interest in a 2007 Nissan with New York Registration Number DVE9907;

(s) all right, title and interest in a Blue Nissan Altima with New York Registration Number EHA5720;

(t) all right, title and interest in a Grey Infiniti G35 Nissan with New York Registration Number ENA7984;

(u) all right, title and interest in a White Mercedes Benz E55 with New York Registration Number CMP5959;

(v) all right, title and interest in a Grey Cadillac DeVille with New Jersey Registration Number DZZ46;

(w) all right, title and interest in a 2007 Grey Toyota Sequoia with New York Registration Number CTL6853;

(x) all right, title and interest in a 2006 Black Lincoln Navigator with New York Registration Number ETM3164;

(y) all right, title and interest in a Black Lincoln with New York Registration Number FBE3831;

(z) all right, title and interest in a Grey Chevy Tahoe with New York Registration Number ENF2892;

(aa) all right, title and interest in a 2008 Black GMC Yukon with Pennsylvania Registration Number HCF9792;

(bb) all right, title and interest in a 2007 Black Chevy Tahoe with New York Registration Number EVV1312;

(cc) all right, title and interest in a 2007 White Cadillac Escalade with New York Registration Number EVS6165;

(dd) all right, title and interest in a Grey Pontiac Grand Prix with New York Registration Number ESD6545;

(ee) all right, title and interest in a Grey Mercedes Benz with New York Registration Number FCY 2915;

(ff) all right, title and interest in a Grey Mercedes Benze 500 with New York Registration Number EDE6255;

(gg) all right, title and interest in a Grey Mercedes Benz SL5 with New York Registration Number DMM8246;

(hh) all right, title and interest in a 2008 Black Cadillac Escalade with New York Registration Number FHR1121;

(ii) all right, title and interest in a White Mercedes Benz with New York Registration Number ESR9299;

(jj) all right, title and interest in a 2010 White Dodge Ram 1500 with New York Registration Number EWD1800;

(kk) all right, title and interest in a Black Chevy Cavalier with New York Registration Number EUG5973;

(ll) all right, title and interest in a 2008 Black Lincoln Navigator with New York Registration Number EPU8066;

(mm) all right, title and interest in a Grey GMC Yukon with New York Registration Number EMZ1851;

(nn) all right, title and interest in a Black GMC Yukon with New York Registration Number EYD7688;

(oo) all right, title and interest in a 2010 Black Subaru Legacy with New Jersey Registration Number ZLG20G;

(pp) all right, title and interest in a 2008 White Range Rover with New Jersey Registration Number YDY67M;

(qq) all right, title and interest in a Grey Chevy Impala with New Jersey Registration Number ZZZ46X;

(rr) all right, title and interest in \$180,000.00 in United States currency seized on July 2, 2010;

(ss) all right, title and interest in \$155,000.00 in United States currency seized on October 13, 2010; and

(tt) all right, title and interest in \$300,00.00 in United States currency seized on March 11, 2011.

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the above-described forfeitable property.

(Title 21, United States Code, Sections 853(a) and 853(p))

CRIMINAL FORFEITURE ALLEGATIONS AS TO COUNT NINE
(Money Laundering and Money Laundering Conspiracy)

14. The United States hereby gives notice to the defendants charged in Count Nine that, upon their conviction for such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a), of all property, real and personal, involved in the offenses, and any property traceable thereto, including but not limited to the following:

Money Judgment

(a) a sum of money equal to at least approximately \$15,000,000.00, the total amount of money involved in the offenses, for which the defendants are jointly and severally liable.

Specific Property

(b) all right, title and interest in the real property located at 1957 Bronxdale Avenue, Apt. B34, Bronx, NY;

(c) all right, title and interest in the real property located at 1523 Waterson Drive, Bronx, NY;

(d) all right, title and interest in the real property located at 300 Mamaroneck Avenue Apt. 325, White Plains, NY;

(e) all right, title and interest in the real property located at 2797 Mandalay Beach Road, Wantagh, NY;

(f) all right, title and interest in the real property located at 64 Crotty Avenue, Yonkers, NY;

(g) all right, title and interest in the real property located at 24 Seagull Lane Lincroft, NJ 07738;

(h) all right, title and interest in a 2010 Grey Volkswagen Jetta with New York Registration Number EVB3720;

(i) all right, title and interest in a 2006 Blue Buick Rendezvous with New York Registration Number DRP3365;

(j) all right, title and interest in a 2007 Grey Cadillac with New York Registration Number EXB9982;

(k) all right, title and interest in a 2007 Grey Audi A8 with New York Registration Number FCW9455;

(l) all right, title and interest in a Grey Nissan 350Z with Florida Registration Number PEA2Q;

(m) all right, title and interest in a 2008 Black Cadillac Escalade with New York Registration Number FHR1121;

(n) all right, title and interest in a 2007 Grey Jeep Grand Cherokee Cadillac with New York Registration Number ECT6888;

(o) all right, title and interest in a 2009 Acura TSX with New York Registration Number EJT3935;

(p) all right, title and interest in a Grey Volkswagen Golf with New York Registration Number ERK4718;

(q) all right, title and interest in a 2008 Green Volkswagen Passat with New York Registration Number DFN2049;

(r) all right, title and interest in a 2007 Nissan with New York Registration Number DVE9907;

(s) all right, title and interest in a Blue Nissan Altima with New York Registration Number EHA5720;

(t) all right, title and interest in a Grey Infiniti G35 Nissan with New York Registration Number ENA7984;

(u) all right, title and interest in a White Mercedes Benz E55 with New York Registration Number CMP5959;

(v) all right, title and interest in a Grey Cadillac DeVille with New Jersey Registration Number DZZ46;

(w) all right, title and interest in a 2007 Grey Toyota Sequoia with New York Registration Number CTL6853;

(x) all right, title and interest in a 2006 Black Lincoln Navigator with New York Registration Number ETM3164;

(y) all right, title and interest in a Black Lincoln with New York Registration Number FBE3831;

(z) all right, title and interest in a Grey Chevy Tahoe with New York Registration Number ENF2892;

(aa) all right, title and interest in a 2008 Black GMC Yukon with Pennsylvania Registration Number HCF9792;

(bb) all right, title and interest in a 2007 Black Chevy Tahoe with New York Registration Number EVV1312;

(cc) all right, title and interest in a 2007 White Cadillac Escalade with New York Registration Number EVS6165;

(dd) all right, title and interest in a Grey Pontiac Grand Prix with New York Registration Number ESD6545;

(ee) all right, title and interest in a Grey Mercedes Benz with New York Registration Number FCY 2915;

(ff) all right, title and interest in a Grey Mercedes Benze 500 with New York Registration Number EDE6255;

(gg) all right, title and interest in a Grey Mercedes Benz SL5 with New York Registration Number DMM8246;

(hh) all right, title and interest in a 2008 Black Cadillac Escalade with New York Registration Number FHR1121;

(ii) all right, title and interest in a White Mercedes Benz with New York Registration Number ESR9299;

(jj) all right, title and interest in a 2010 White Dodge Ram 1500 with New York Registration Number EWD1800;

(kk) all right, title and interest in a Black Chevy Cavalier with New York Registration Number EUG5973;

(ll) all right, title and interest in a 2008 Black Lincoln Navigator with New York Registration Number EPU8066;

(mm) all right, title and interest in a Grey GMC Yukon with New York Registration Number EMZ1851;

(nn) all right, title and interest in a Black GMC Yukon with New York Registration Number EYD7688;

(oo) all right, title and interest in a 2010 Black Subaru Legacy with New Jersey Registration Number ZLG20G;

(pp) all right, title and interest in a 2008 White Range Rover with New Jersey Registration Number YDY67M;

(qq) all right, title and interest in a Grey Chevy Impala with New Jersey Registration Number ZZZ46X;

(rr) all right, title and interest in \$180,000.00 in United States currency seized on July 2, 2010;

(ss) all right, title and interest in \$155,000.00 in United States currency seized on October 13, 2010; and

(tt) all right, title and interest in \$300,00.00 in United States currency seized on March 11, 2011.

15. If any of the above-described forfeitable property, as result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States, pursuant to Title 18 United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

(Title 18, United States Code, Sections 982(a)(1) and 982(b))

CRIMINAL FORFEITURE ALLEGATION AS TO COUNTS TEN AND ELEVEN
(Use of Firearms During and in Relation to Drug Trafficking)

16. The United States hereby gives notice to the defendants charged in Counts Ten and Eleven that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), of all firearms and ammunition involved in the commission of said offenses, including but not limited to: one Bersa 380 handgun and ammunition seized on June 8, 2010; and one .45 caliber Glock semi-automatic pistol and ammunition seized on October 2, 2010.

17. If any of the above-described forfeitable property, as result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK